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May 19, 2008

MUR # 6017

Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

PRE-MUR # 471

Re: Violations of FECA by Christopher J. Ward
10597 John Ayres Drive, Suite A
Fairfax, VA 22032

To Whom It May Concern:

On behalf of Prosperity Helps Inspire Liberty Political Action Committee, ("Phil PAC"), I submit this complaint for knowing and willful violations of the Federal Election Campaign Act against Christopher J. Ward, the former treasurer of Phil PAC.

Ward was the treasurer of Phil PAC from 2002 until February 7, 2008. Upon learning through the media about the concerns the National Republican Congressional Committee ("NRCC") had with Ward's services as treasurer, Phil PAC terminated Ward and hired a new treasurer, Lisa Lisker. Lisker began to conduct a review of the FECA filings and bank records to reconcile the two sources of data and confirm the accuracy and completeness of reports filed with the Commission. As a result of her review, Phil PAC filed amended reports the week of May 19, 2008 recasting reports from 2006, 2007 and 2008, and is conducting a review of prior years to determine whether additional amendments will be required.

As a result of Lisker's review of 2006, 2007 and 2008 data, Phil PAC identified two checks that were written from Phil PAC to "Chris Ward" in the fall of 2007 to which he was not entitled. One check was dated October 29, 2007 in the amount of \$10,000. The other was dated September 28, 2007 in the amount of \$7,000. See Exhibit A. According to Annette Carr, Congressman Phil English's Chief of Staff and volunteer manager of Phil PAC, Ward was not entitled to receive these checks and they were not authorized by the PAC. In fact, Carr believes that these checks may constitute both fraud and theft, and as such the amended reports declare these expenditures to be misappropriated funds. In addition, Ward did not disclose these two checks on reports he filed with the FEC. The failure to disclose these payments was in knowing and willful

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violation of 2 U.S.C. §§ 434 and 439a, and 11 C.F.R. § 104.3. These checks were not for any lawful purpose permitted in 2 U.S.C. § 439a.¹ The amendments submitted reflect the actual activity in the bank account.

Furthermore, it appears that Ward failed to deposit a check to Phil PAC from the Tuesday Group Political Action Committee ("TG PAC") in the amount of \$1,500 that was reported on the Year End 2007 report. The original year end report shows a deposit of \$1,500 from TG PAC. See Exhibit B. However, bank records do not reflect that a \$1,500 check from TG PAC was in fact ever deposited into Phil PAC's account. Ward's failure to deposit this check constitutes a knowing and willful violation of 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3. The amended year-end report indicates the actual activity in the bank account.


As a result of Ward's failure to report these improper withdrawals and failure to deposit funds, his failure to communicate accurate information about the account balances, and failure to file accurate FEC report, two checks to 3 Dog Consulting (a fundraising consultant) failed to clear in December of 2007. As a result, Phil PAC was forced to pay additional bank fees. The amendments submitted reflect these overdrafts and the associated bank fees.

Finally, on January 29, 2008, Phil PAC received an impermissible \$15,000 check. See Exhibit C. At the time of this deposit, Ward was the treasurer of Phil PAC. Ward committed knowing and willful violations of the FECA by depositing this check into Phil PAC's account for an amount over the limits set forth at 2 U.S.C. § 441a. On February 8, 2008, the day after being retained as Treasurer, Barker identified this impermissible contribution and wrote a refund check. This deposit and subsequent refund have been disclosed on Phil PAC's January 2008 and February 2008 monthly reports already on file with the Commission.

In addition, Ward failed to accurately report bank fees on a number of occasions. These failures to report bank fees constitute knowing and willful violations of 2 U.S.C. §§ 434 and 439a and 11 C.F.R. § 104.3 by Ward.

We believe that these actions by Ward constitute knowing and willful violations of the FECA, and respectfully request that the Commission investigate and take appropriate action to address these multiple violations by Ward.

Sincerely,



Jason Tordinsky
Counsel to Phil PAC

¹ We believe that Ward's apparent theft from Phil PAC may constitute violations of other federal criminal provisions outside of the jurisdiction of the Federal Election Commission, and we have been in communication with the appropriate law enforcement authorities to address these concerns.

Jason Torchinsky, hereby verifies that the statements made in the above complaint are,
upon information and belief, true.

Sworn to pursuant to 18 U.S.C. § 1001.


NAME

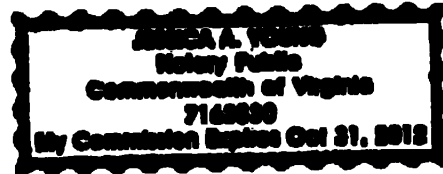
Fauquier County
Commonwealth of Virginia

The foregoing instrument was subscribed and sworn before me this 19 day of May,
2008 by


Notary Public

Jessica A. Young

My commission expires Oct. 31, 2012



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